

ATTACHMENT B

STATE OF TEXAS
HARRIS COUNTY

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AFFIDAVIT OF CATHERINE ENGELBRECHT

Before me, the undersigned notary, on this day personally appeared Catherine Engelbrecht, whose identity is known to me, who under oath states as follows:

1. My name is Catherine Engelbrecht. I am over 18 years of age, of sound mind, and capable of making this affidavit. The facts stated in this affidavit are within my personal knowledge and are true and correct.

2. I have read and am familiar with Plaintiff Konnech, Inc.'s Motion to Show Cause and for Contempt Against Defendants Related to the Preliminary Injunction and Direct Orders from the Bench, filed on December 5, 2022, wherein Plaintiff speculates that a file name must have had something to do with Plaintiff because the file contained "PII" in the title.

3. For a period from late January 2021 through October 12, 2022, Gregg Phillips and I were in frequent contact with the FBI about many matters relating to election integrity. Konnech was but one of the subjects we discussed.

4. In early June, 2022, Mr. Phillips contacted me saying someone in a Telegram group had singled him out and sent him two files as well as a threatening audio recording.

5. Mr. Phillips sent me a screenshot of each of the files, one titled "Romania Brief Final (1).pdf" and the other titled "SORT_BY_STATE_PII_filter_SSN_Dupes_DLN_FINAL_MERGED_WITH_COUNTIES.ods".

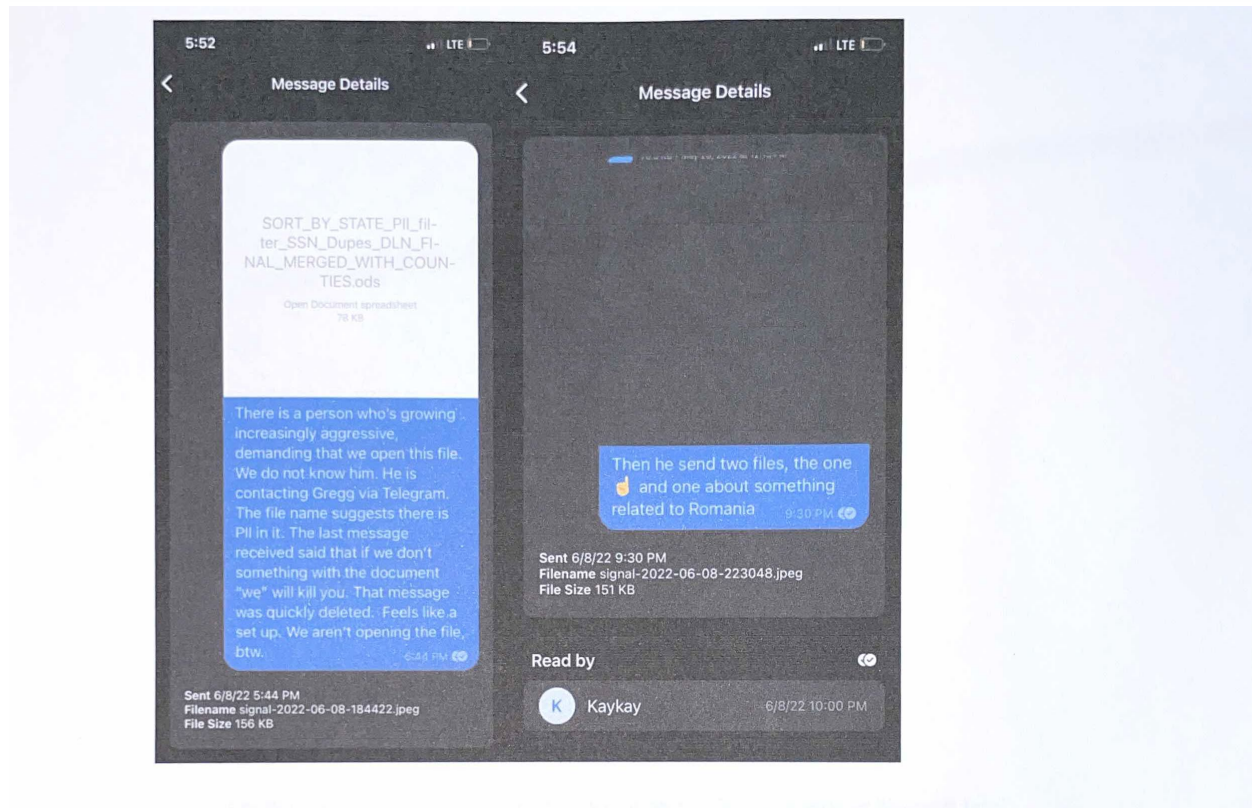
6. Mr. Phillips relayed that he was suspicious of the source, B., even before the person threatened him if he did not open the file, saying "We will kill you." Mr. Phillips and I never attempted to open the document because we feared it could contain malware, because the file and the sender were both obviously highly suspect, and because the file lacked any evident relevance to us or True the Vote's operations.

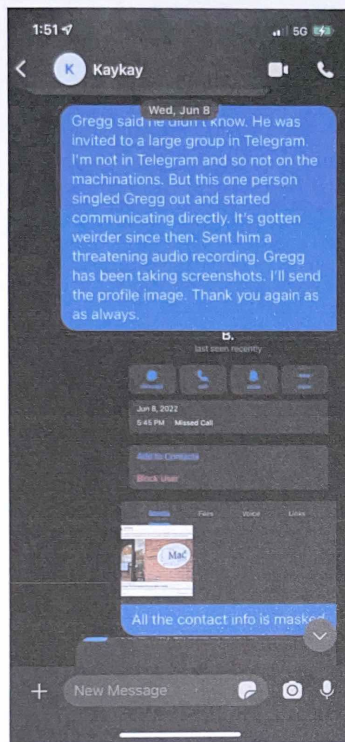
7. The file was not created by me or any other Defendant or anyone associated with us.

8. It was not even clear that the file contained any information at all beyond a title. Subsequent attempts to forward the file to our attorneys revealed no spreadsheet but simply a PNG image file.

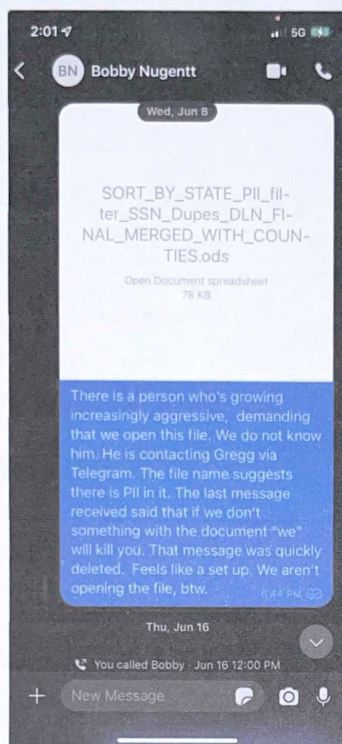
9. I have no reason to believe that the letters "PII" in the file name necessarily refer to "personal identifying information", nor that any such information was actually in the file, nor that any of that information related to Konnech, Inc.

10. On June 8, 2022, via text message, I reported the threats and the existence of the file to one of my contacts at the FBI. The agent with whom I shared the information was listed in my contacts as KayKay:





11. On the same day, I sent the same information to FBI agent Bobby Nugentt [sic]:



12. I have no knowledge as to whether the FBI possesses the file.

13. Mr. Phillips informed me that he closed down the Telegram account through which the file came. We have no access to the file now. When we have attempted to forward it, all we have seen is a PNG image file.

Further Affiant Sayeth Not.

Catherine Engelbrecht

Subscribed to and sworn before me on this 27 day of December, 2022.

Notary Public in and for the state of Texas

